

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

WORKSCAPE, INC.,)	
Plaintiff,)	
)	
v.)	Civil Action No. 05-11481-MEL
)	
WORKSTREAM, INC.,)	
Defendant.)	

**MOTION TO ADMIT RICHARD E. LIEBERMAN, ESQ.
AND GARY Y. LEUNG, ESQ. PRO HAC VICE**

Sanzone & McCarthy, LLP, counsel for Defendant Workstream, Inc., respectfully moves, pursuant to United States District Court for the District of Massachusetts Local Rule 83.5.3, that Richard E. Lieberman, Esq. and Gary Y. Leung, Esq., both of the Bar of the State of Illinois, be admitted *pro hac vice* to appear, participate and practice before this Court for the purposes of representing Defendant Workstream, Inc. in this case before the Bar of the United States District Court for the District of Massachusetts.

In support of this Motion, Defendant has attached hereto the Affidavits of Richard E. Lieberman, Esq. and Gary Y. Leung, Esq., as Exhibit A and Exhibit B, respectively.

Respectfully submitted,
DEFENDANT WORKSTREAM, INC.,
By Its Attorneys,

/s/ Christopher W. Sanzone
Christopher W. Sanzone, Esq. (BBO#633109)
John T. McCarthy, Esq. (BBO#641406)
Sanzone & McCarthy, LLP
888 Worcester Street, Suite 110
Wellesley, MA 02482
(781) 239-9989
chris@sanzonemccarthy.com

Dated: July 22, 2005

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

WORKSCAPE, INC.,

Plaintiff,

v.

WORKSTREAM, INC.,

Defendant.

Civil Action No. 05-11481-MEL

**AFFIDAVIT IN SUPPORT OF MOTION TO ADMIT
RICHARD E. LIEBERMAN, ESQ. PRO HAC VICE**

Under oath, I depose and state the following:

1. My name is Richard E. Lieberman and I am a Partner with the law firm of McGuireWoods LLP, located at 77 West Wacker Drive, Suite 4100, Chicago, Illinois 60601.
2. I am a member in good standing of the Bar of the State of Illinois and have been since 1975. I am also a member in good standing of the Bar of the State of Ohio and have been since 1971. I am also authorized to practice before the United States Circuit Court of Appeals for the Second, Third, Fourth, Sixth, Seventh, Eighth and Ninth Circuits and the United States District Court for the Northern District of Illinois.
3. There are no outstanding disciplinary proceedings pending against me as a member of the bar in any jurisdiction and I have never been censured, suspended or otherwise disciplined by any court.
4. My firm represents the Defendant Workstream, Inc. with respect to the above-referenced matter, and I have knowledge of the facts of the above captioned case as counsel to

Workstream, which would make it more efficient and effective for me to represent it in this matter.

5. I ordinarily represent litigants in employment and business disputes and I have been involved in this case since its inception.

6. I have familiarized myself with the Local Rules of Practice for the United States District Court for the District of Massachusetts.

Signed under the pains and penalties of perjury this 20th day of July, 2005.

/s/ Richard E. Lieberman

Richard E. Lieberman

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

WORKSCAPE, INC.,

Plaintiff,

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WORKSTREAM, INC.,

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**AFFIDAVIT IN SUPPORT OF MOTION TO ADMIT
GARY Y. LEUNG, ESQ. PRO HAC VICE**

Under oath, I depose and state the following:

1. My name is Gary Y. Leung and I am an Associate with the law firm of McGuireWoods LLP, located at 77 West Wacker Drive, Suite 4100, Chicago, Illinois 60601.
2. I am a member in good standing of the Bar of the State of Illinois and have been since 2002.
3. My firm represents the Defendant Workstream, Inc. with respect to the above-referenced matter, and I have knowledge of the facts of the above captioned case as counsel to Workstream, which would make it more efficient and effective for me to represent it in this matter.
4. There are no outstanding disciplinary proceedings pending against me as a member of the bar in any jurisdiction and I have never been censured, suspended or otherwise disciplined by any court.
5. I ordinarily represent litigants in business disputes and I have been involved in this case since its inception.

6. I have familiarized myself with the Local Rules of Practice for the United States District Court for the District of Massachusetts.

Signed under the pains and penalties of perjury this 20th day of July, 2005.

/s/ Gary Y. Leung

Gary Y. Leung